

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP, *in his personal capacity,*

*Defendant.*

No. 20 Civ. 7311 (LAK)

**[PLAINTIFF'S PROPOSED] VERDICT FORM**

**It is established that Mr. Trump defamed Ms. Carroll on June 21, 2019 and June 22, 2019.**

**Did Ms. Carroll prove, by a preponderance of the evidence, that:**

1. Ms. Carroll was injured as a result of Mr. Trump's June 21, 2019 and June 22, 2019 statements?

YES \_\_\_\_\_ NO \_\_\_\_\_

If "Yes," insert a dollar amount for any damages other than the reputation repair program.

\$ \_\_\_\_\_

If "Yes," insert a dollar amount for any damages for the reputation repair program only.

\$ \_\_\_\_\_

If "No," insert \$1.

\$ \_\_\_\_\_

*[Continue to Question 2, whether you answered "Yes" or "No."]*

2. In making the June 21, 2019 and June 22, 2019 statements, Mr. Trump acted maliciously, out of hatred, ill will, spite or wanton, reckless, or willful disregard of the rights of another?

YES \_\_\_\_\_ NO \_\_\_\_\_

If “Yes,” how much, if any, should Mr. Trump pay to Ms. Carroll in punitive damages?

\$ \_\_\_\_\_

*[Please write your juror number (not your seat number or name) in the space provided below, fill in the date, and inform the officer that you have reached a verdict.]*

Dated: \_\_\_\_\_, 2024

Juror numbers:

_____	_____
_____	_____
_____	_____
_____	_____
_____	

Dated: New York, New York  
November 15, 2023

Respectfully submitted,



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